

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2021-192-E

In re:

Dominion Energy South Carolina,
Incorporated Coal Retirement Docket
Opened Pursuant to Commission Order
No. 2021-418

**SIERRA CLUB'S SECOND SET
OF DATA REQUESTS
January 28, 2022**

Pursuant to R.103-833 of the South Carolina Code of Regulations, Intervenor Sierra Club, by and through undersigned counsel, serves the following data requests on Dominion Energy South Carolina, Inc. ("Dominion" or the "Company") in the above referenced consolidated dockets. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure.

INSTRUCTIONS

1. These requests should be regarded as continuing. If, after filing its initial response to the interrogatories and requests, the Company becomes aware of any information that would alter or amend any responses, please provide updated responses as additional information becomes available.
2. If a response to any of the attached requests requires any calculations, analyses, assumptions, or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies—including all work papers relating thereto. For any analyses or calculations prepared

using electronic workbooks, please provide operational versions of those spreadsheets as well as all operational versions of all supporting workbooks used to develop inputs.

3. Produced documents should include originals and all other copies which are not absolutely identical as well as all drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such documents, whether used or not.
4. With respect to requests for analyses or calculations that were prepared using electronic workbooks, please provide operational versions of those spreadsheets (i.e., with calculations active) as well as all operational versions of all supporting workbooks used to develop inputs.
5. Unless otherwise specified, all requests for documents herein pertain to the Company's South Carolina operations. Please ensure that all responses are specific to the Company's South Carolina service territory. Where South Carolina-specific data are not available, please provide an appropriate factor, method or percentage to allow for an accurate estimate of South Carolina-specific data to be performed.
6. If you consider any document to be privileged or protected from production, then you must:
(i) include in your response a list of documents withheld from production, (ii) identify each document by date, addressee, author, title and subject matter, (iii) identify those persons who have seen the document or who were sent copies, and (iv) state the ground(s) upon which each such document is considered privileged or protected.
7. Due to COVID-19 and most people working remotely, please deliver all responses to the following interrogatories and requests for production of documents **electronically** to:

Robert Guild
bguild@mindspring.com

Dorothy E. Jaffe
dori.jaffe@sierraclub.org

DEFINITIONS

1. The “Company” is defined to include both Dominion Energy South Carolina, Inc. and any consultants or other agents that assisted in the development or preparation of the plan for electric distribution grid transformation projects.
2. “Communications” shall mean all oral communications and all written communications, including all “documents,” as defined below.
3. “Describe” means to state in detail each and every basis for the position taken or the statement made in response to the request and includes identifying each and every statement or document relied on and provide a copy of all such identified documents.
4. “Document” is defined to include all materials, of any kind or description, in any medium, regardless of where or how maintained or accessed (such as in or through official work or personal files, accounts, or devices). Documents include, by way of illustration only, correspondences, papers (including working papers), electronic mail (including any attachments), telegrams, facsimiles, notes, sound or video recordings, voice mail, minutes, memoranda, inter- or intra-office communications, diaries, daily logs, records, reports, studies, estimates, surveys, written forecasts, analyses, contracts, licenses, agreements, charts, graphs, indexes, database or other electronic records, statistical records, data sheets, data processing cards, computer printouts, computer discs, videotapes, motion pictures, agendas, meeting invitations, websites, intranet pages, and other electronic communications, any notes or drafts relating to any of the foregoing, and any other documents of any kind in your possession, custody or control or to which you have access or known to exist..
5. “Identify,” “identification,” as used with respect to a person means to state the person’s full name and present address and his present or last known employment position and business

affiliation if a natural person, and corporate or other status and address if not a natural person.

“Identify” or “identity” when used in reference to a document means to state the following as to each document:

- a. Its nature and contents;
 - b. Its date;
 - c. The date it was executed if different from the date it bears;
 - d. The name, address and position of its author or signer;
 - e. The name, address and position of its addressee, if any;
 - f. Its present location and the name, present address and position of the person or persons having present custody; and
 - g. Whether it has been destroyed, and if so, with regard to such destruction; (i) the date of destruction; (ii) the reason for destruction; and (iii) the identity of the person who destroyed the document.
6. “Including” means “including but not limited to.”
 7. “Person” includes any individual, sole proprietorship, partnership, corporation, association, trust, statutory trust, joint venture, or other entity.
 8. “You” or “your” means the Company and its agents, employees, representatives, attorneys, experts, investigators, insurers, consultants, or anyone acting on behalf of the Company.

DATA REQUESTS

Request No. 2-1. In the coal retirement Transmission Impact Analysis (“TIA”), filed with the Commission on January 7, 2022, did the Company evaluate any scenarios or portfolios with replacement resources located at the Williams Plant or a nearby site located within the greater Charleston area (load center)?

- a. If so, please provide details of each of the replacement resources, including technology type, size, point of interconnection, and configuration.
- b. If not, please explain why replacement resources located within the greater Charleston area were not evaluated.
- c. If not, please explain whether resources located at the Williams Plant location, or in close proximity to the Williams Plant location, would increase or decrease transmission costs identified in the TIA.

Request No. 2-2. Has the Company considered siting new standalone battery energy storage systems or combustion turbines at the Williams Plant location?

- a. If so, assuming the Williams Plant is retired, what is the total capacity of standalone battery energy storage systems or combustion turbines that could be sited at the existing Williams Plant location before transmission upgrades would be required?
- b. Would replacement resources at the Williams Plant location increase or decrease the proposed transmission costs associated with the coal plant retirements?

Request No. 2-3. For each of the power flow cases evaluated in the TIA (i.e., summer peak 2031, Winter 2031, Shoulder 2029), please provide the dispatch level (MW) and maximum capacity (MW, inverter AC for solar and battery resources) for each resource in DESC's system, as well as line flows for interties with neighboring balancing authorities.

- a. Please provide an explanation about how the dispatch level of thermal resources was determined.
- b. Please provide an explanation about how the dispatch level of variable renewable resources (i.e., solar PV) was determined.

- c. Please clarify if all PV resources and BESS resources in the DESC and Santee Cooper territory that are modeled in the AC Contingency Analysis have the same % dispatch. If the dispatch varies across the same types of resources in the territory, please explain the reason for the variation.

Request No. 2-4. Please describe the power flow solution options enabled (operator adjustments allowed) after the first (maintenance) outage for all N-1-1 contingencies.

Request No. 2-5. For each case evaluated in the TIA, please provide the results of the security-constrained redispatch (“SRD”) that were performed and describe the reasons for why any changes resulting from the SRD for mitigating violations were not accepted.

Request No. 2-6. Has the Company included any nodal transmission topology or transmission constraints in the PLEXOS production cost model to identify potential congestion and/or transmission overloads with proposed replacement scenarios?

Request No. 2-7. Can the Company provide an estimate regarding the total transmission import capability into the greater Charleston area for summer and winter peak load conditions?

- a. Please provide the number, voltage, and thermal rating for any lines that connect DESC’s broader service territory to the greater Charleston Area.

Request No. 2-8. Refer to the DESC IRP Stakeholder Advisory Group Meeting #6 Presentation, Slide 50, where it states: “Williams ELG costs are assigned on 01/01/2025 and cannot be avoided.” Please provide an explanation as to why the Company is assigning the Williams Effluent Limitation Guidelines (“ELG”) costs on January 1, 2025 and why the Company cannot avoid the ELG costs at Williams.

- a. Did the Company file a Noticed of Planned Participation with the South Carolina Department of Health and Environmental Control under 40 C.F.R. §§ 423.19(e), 423.19(f), or 423.19(h) for the Williams Plant?
- b. Did the Company consider opting to comply with the Voluntary Incentive Program requirements under 40 C.F.R. § 423.13(g)(3), which has a compliance deadline of December 31, 2028? If not, why not?
- c. Has the Company considered any replacement resources that can be developed between now and January 1, 2025 to avoid the ELG costs at Williams? If not, why not?

Request 2-9. Refer to the DESC IRP Stakeholder Advisory Group Meeting #6 Presentation, Slide 50, where it states: “Wateree 1 ELG costs are assigned on 01/01/2029, thus avoided with a retirement. Williams ELG costs are assigned on 01/01/2025 and cannot be avoided.” Please provide an explanation as to why the ELG costs can be avoided at Wateree 1 but not at Williams.

Request 2-10. Refer to the DESC IRP Stakeholder Advisory Group Meeting #6 Presentation, Slide 50, where it states: “Wateree 1 ELG costs are assigned on 01/01/2029, thus avoided with a retirement.”

- a. Are there ELG costs associated with Wateree Unit 2?
- b. If there are ELG costs associated with Wateree Unit 2, on what date are those costs assigned?
- c. If there are ELG costs associated with Wateree Unit 2, can those costs be avoided by electing to retire Unit 2 by December 31, 2028?
- d. If there are no ELG costs associated with Wateree Unit 2, why not?

Respectfully submitted this 28th day of January, 2022.

A handwritten signature in black ink, appearing to be 'D. Jaffe', written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2021-192-E, listed below, a copy of the Sierra Club's Second Set of Data Requests via electronic mail on this day, January 28, 2022.

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Dorothy Jaffe